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9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **OAKLAND DIVISION**
12

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 MORTEZA AMIRI,

17 Defendants.
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Case No. 23-cr-00269 JSH

**DECLARATION OF JANELLE
CRANDELL IN SUPPORT OF
DEFENDANT MORTEZA AMIRI'S
SENTENCING MEMORANDUM**

I, Janelle Crandell, declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am an associate at the law firm of Goyette, Ruano and Thompson, attorneys of record for Morteza Amiri.
2. Except where otherwise stated, I have personal knowledge of the facts set forth herein, and, if called to testify as a witness thereto, I could do so competently under oath. I submit this declaration in support of Mr. Amiri's Sentencing Memorandum.
3. Attached hereto as **Exhibit A** are true and correct copies of 63 character letters that have been submitted in support of Mr. Amiri. The letters are indexed below. The letters denoted by an asterisk were previously submitted to U.S. Probation in connection with Mr. Amiri's pre-sentence interview.¹

Letter No.	Author	Relationship
1*	Lailoma Akbarpour	Mother
2*	Ali Najafpour	Cousin
3*	Parviez Najafpour	Cousin
4*	Nargis Zarrinkhoo	Cousin
5*	Payman Najafpour	Cousin
6*	Hussain Akbarpour	Cousin
7	Loren Mixon	Officer Mentor; Friend
8	Kobra Akbarpour	Grandmother
9*	Jeanette Cazares	Friend
10*	Dustin Greene	Former Colleague (Brentwood Police Department)
11*	Emily Amiri	Wife
12*	Kelly Azevedo	Mother-in-Law
13	Juanita Delgado	Grandmother-in-Law
14	Steven Aiello	Retired Antioch Police Officer; Former President of Antioch Police Officers' Association
15*	Lynn Dansie	Records Employee (Antioch & Brentwood Police Department); Friend
16*	John Hulleman	Retired Antioch Police Officer; Friend
17	Freeman & Connie Phillips	Neighbors
18*	Walter "Waleed" Akbar	Real Estate Business Colleague; Friend
19*	Patrick Hulleman	Real Estate Business Colleague; Friend
20*	Sal Azevedo	Father-in-Law
21	Anonymous	Former Colleague (Antioch Police Department)
22	Behroz Akbarpour	Uncle
23	David Akbarpour	Uncle
24	Elyas Akbarpour	Cousin
25	Eman Akbarpour	Cousin

¹ After counsel for Mr. Amiri provided a sample of letters to U.S. Probation, Letter No. 10's author revised his letter. The revised version of the letter is attached to Mr. Amiri's sentencing memorandum.

26	Farhad Akbarpour	Cousin
27	Farid Akbarpour	Cousin
28	Fraidon Akbarpour	Uncle
29	Gita Akbarpour	Cousin
30	Jawad Akbarpour	Uncle
31	Omid Akbarpour	Cousin
32	Sarah Akbarpour	Cousin
33	Shawn Akbarpour	Cousin
34	Shougofa Akbarpour	Aunt
35	Tannaz Akbarpour	Cousin
36	Yalda Akbarpour	Cousin
37	Zahra Akbarpour	Cousin
38	Yalda Benjamin	Family Friend
39	Brandon Bushby	Former Coworker; Friend
40	Roy Bryson	Family Friend
41	Yvette Bryson	Family Friend
42	Nicole Cedano	Antioch Citizen
43	Kathryn Cole	Family Friend
44	Maryam Falahati	Family Friend
45	Kash Ghazanfarpour	Friend
46	Suwila Habib	Family Friend
47	Mina Hamkar	Second Cousin
48	Eric Johnsen	Former Colleague / Supervisor (Antioch Police Department, Retired)
49	Farra Kandahari	Cousin
50	Sean McCauley	Real Estate Business Colleague; Friend
51	Adam Miller	Private Security Officer; Professional Acquaintance
52	Sohaila Moradi	Family Friend
53	Andrew Morehead	Friend
54	Marco Moroyoqui	Family
55	Douglas Morrison	Former Colleague (Brentwood Police Department)
56	Azita Munsif	Family Friend
57	Hashim Najafpour	Uncle
58	Laila Najafpour	Aunt
59	Zoli Partovi	Aunt
60	Mari Saleh	Cousin
61	Muzhda Samadi	Cousin
62	Sammy Sharifi	Family Friend
63	Sousan Taymuree	Family Friend

Executed on this 16th day of June, 2025.

/s/

Janelle Crandell